

LEWIS D. PARTRIDGE
Bankruptcy Trustee
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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

IN RE: CASE NO: **11-20509**
DCN: **LDP-001**
MONIR POORSINA DATE: **November 29, 2011**
Debtor(s). TIME: **9:30am**
COURTROOM: **35**

MOTION FOR SALE OF ESTATE ASSETS TO DEBTOR

The motion of LEWIS D. PARTRIDGE, as Trustee of the estate of the above-named debtor, respectfully represents:

1. That movant is the duly elected, qualified and acting Trustee of the estate of the above-named debtor.
2. The Trustee has reviewed the estate's interest in real property, commonly-known as 8941 Kodiak Way in Roseville, CA, 95747 (hereinafter, the PROPERTY), including its condition, its value, the validity of any liens, and any claimed exemption.
3. The Trustee has received an offer from the Debtor to buy the estate's interest in the PROPERTY in exchange for \$30,498.63 to be tendered from the Debtor, subject to the approval of the Court.
4. The offer from the Debtor is calculated to provide sufficient funds to the estate to pay all anticipated and projected administrative fees and costs as well as all filed and allowed claims in full. The source of funds to be

tendered to the Trustee by the Debtor is the post-petition gifts of money from the Debtor's family.

5. The Court initially set a deadline for the filing of timely claims in this case. The deadline was set at June 22, 2011.

6. The Trustee has reviewed the filed claims register as maintained by the Court and determined that the total of all unsecured claims that were timely filed is \$21,966.45.

7. The Trustee has also determined that there appears to be no objection that can be raised against any of the filed claims.

8. The offer received from the Debtor is as follows:

Total amount to be tendered:\$30,498.63
Less: Projected maximum Trustee compensation: -\$2,799.86
Less: Projected Estate income taxes on this sale¹:..... -\$3,232.32
Less: CPA fees for preparation of estate income tax return:... -\$1,500.00
Net Funds for unsecured claims:\$21,966.45
Total timely-filed Unsecured claims:\$21,966.45

9. The Trustee has determined that the interests of estate would be best served by selling the estate's interest in PROPERTY directly to the Debtor at an "Arm's Length" sale to maximize the proceeds and minimize the administrative costs of sale.

10. The Trustee has standing to sell this PROPERTY under §363(b) of Title 11 US Codes.

¹ Capital Gains income taxes computed at 15% of total amount to be tendered

1 WHEREFORE, Trustee prays for an Order from this Court allowing him to sell the
2 asset as described herein.
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5 DATED: October 17, 2011

/s/ LEWIS D. PARTRIDGE, TRUSTEE
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